

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13  
MICHAEL ANTHONY STEWART : CASE NO. 1:20-bk-02688-HWV  
Debtor(s) :  
DAUPHIN COUNTY TAX CLAIM :  
BUREAU :  
Movant :  
vs. :  
MICHAEL ANTHONY STEWART :  
Respondent(s) :

OBJECTION TO CHAPTER 13 PLAN  
BY DAUPHIN COUNTY TAX CLAIM BUREAU

AND NOW, this 9<sup>th</sup> day of December, 2020, comes Dauphin County Tax Claim Bureau (the “Bureau”), by and through its attorney, Bret P. Shaffer, Esquire, and the law firm of Schiffman, Sheridan & Brown, P.C., and objects to the confirmation of the above-referenced Debtor’s plan for the following reason(s):

1. Debtor’s plan purports to surrender to the Bureau that property located at 1612 North Street, Harrisburg, Pennsylvania, which is subject to certain real estate tax liens.
2. The Bureau does not accept the surrender of property and will not take title.

WHEREFORE, the Bureau respectfully requests this Honorable Court sustain its objection and deny confirmation of the plan.

Respectfully submitted:

SCHIFFMAN, SHERIDAN & BROWN, P.C.

By:/s/Bret P. Shaffer

Bret P. Shaffer, Esquire PA I.D. #309180  
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Attorney for Dauphin County Tax Claim Bureau

CERTIFICATE OF SERVICE

AND NOW, this 9<sup>th</sup> day of December, 2020, I hereby certify that I have served the within Objection by electronically notifying the following parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Chad J. Julius, Esquire                   *Debtor's Counsel*  
Jacobson & Julius  
8150 Derry Street, Suite A  
Harrisburg, PA 17111

Charles J. DeHart, III, Trustee           *Chapter 13 Trustee*  
8125 Adams Drive, Suite A  
Hummelstown PA 17036

/s/Bret P. Shaffer